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19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 GERMAN BARAJAS, an individual,
22 Plaintiff,
23 vs.
24 BYRNECUT US CORPORATION, a
25 Nevada corporation,
26 Defendant.

27 Case No.: 2:25-CV-00473-RFB-MDC

28 **STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
BYRNECUT US CORPORATION TO
FILE RESPONSIVE PLEADING TO
COMPLAINT
(SECOND REQUEST)**

¹ Counsel has complied with LR IA 11-2 and moved for *pro hac vice* admission.

1 Pursuant to Local Rules 6-1 and 6-2, Plaintiff German Barajas (“Plaintiff”) and
2 Defendant Byrnecut US Corporation (“Byrnecut” and together with Plaintiff, the
3 “Parties”) stipulate and agree as follows:

4 **WHEREAS:**

5 1. On or about April 3, 2025, Byrnecut was served with the Summons and
6 Complaint for the above-referenced matter. [ECF No. 6].

7 2. On April 17, 2025, counsel for Byrnecut conferred with Plaintiff’s counsel
8 to request that the Parties agree to extend Byrnecut’s deadline to file a responsive
9 pleading while it continues to gather further information regarding Plaintiff’s claims
10 and obtains resident counsel per the local rules. The Parties agreed that good cause
11 existed to extend Byrnecut’s responsive pleading deadline to May 15, 2025.

12 3. The Court granted the stipulation on April 30, 2025. [ECF No. 10].

13 4. Byrnecut has now obtained resident counsel, as Anjuli B. Woods now
14 works for Weinberg Wheeler Hudgins Gunn & Dial in its Las Vegas, Nevada office.

15 5. On or about May 14, 2025, counsel for Byrnecut conferred with Plaintiff’s
16 counsel to request that the Parties agree to briefly extend Byrnecut’s deadline to file a
17 responsive pleading by seven days, as Byrnecut’s resident counsel transitioned to a
18 new firm, and counsel is finalizing its response to Plaintiff’s Complaint.

19 6. The Parties agreed that good cause exists to briefly extend Byrnecut’s
20 responsive pleading deadline to May 22, 2025.

21 7. This stipulation is made in good faith and not for the purpose of delay.

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1 8. This is the second stipulated request to extend Byrnecut's responsive
2 pleading deadline.

3 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

4 Byrnecut's time to file a responsive pleading to Plaintiff's Complaint is
5 extended. Byrnecut shall file its responsive pleading on or before May 22, 2025.

6 DATED this 14th day of May, 2025.
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IT IS SO ORDERED:

Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

DATED: 5/15/2025